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January 16, 2002

Ms. Lydia E. Berry, Marketing Specialist
Standardization Section
Processed Products Branch
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

REF: U.S. Standards for Grades of Apple Juice from Concentrate

Dear Ms. Berry:

The Apple Processors Association (APA) is a national association of firms that manufacture quality apple products, mainly from the whole apple. They produce a majority of the nation's apple sauce, and much of its apple juice and specialty apple products. Each of our member firms grows a portion of its own apples for use in the processing of its apple products.

APA would like to comment on the Agricultural Marketing Service's (AMS) proposed revisions to the U.S. standards for grades of apple juice from concentrate: *Federal Register*, Vol. 66, No. 225, November 21, 2001.

APA strongly opposes USDA's proposal to establish new U.S. grade standards for apple juice from concentrate. We oppose changing these grade standards for the following reasons:

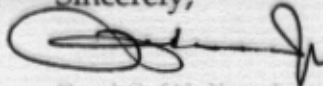
- It is the experience and belief of APA that the currently existing U.S. grade standards are sufficient and inclusive of provisions necessary to protect growers, processors, and consumers. We see no inherent advantage in revising the grade standards at this time;
- APA believes that the current requirement of using 100 percent domestic ingredients in federal government commodity purchase programs is a good one, and defensible under WTO negotiations. It is critically important to protect the U.S. domestic apple industry, which supplies many of our processors' fresh apples, and now struggles under adverse economic conditions. There is no guarantee that if USDA revises current standards, this will not lead to a change in the domestic requirement, with serious adverse consequences to both U.S. apple growers and to processors, who themselves grow thousands of acres of apples;
- APA is also concerned over potential changes in the 25 percent rule for apple juice concentrate used for Brix adjustment in USDA-purchased apple juice. APA supports the current rule without revisions.

With the appointment of the new AMS fruit and vegetable advisory committee, we recommend that the agency consider appointing the three processor members of that committee to a processing sub-committee to study this and like recommendations, taking into proper consideration all industry comments.

Thank you for permitting the Apple Processors Association to comment on this important proposed rulemaking. We invite you to contact us at any time for further discussion, and to access our website at: www.agriwashington.org/apa.

PSW/kb

Sincerely,

A handwritten signature in black ink, appearing to read "Paul S. Weller, Jr.", with a stylized flourish at the end.

Paul S. Weller, Jr.
President